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*Counsel for Plaintiffs*

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
 PASSENGER SEXUAL ASSAULT  
 LITIGATION

MDL No. 3084 CRB

Honorable Charles R. Breyer

**DECLARATION OF DENNIS R. REICH  
 IN SUPPORT OF REICH & BINSTOCK,  
 LLP’S MOTION TO WITHDRAW AS  
 COUNSEL OF RECORD FOR  
 PLAINTIFFS A.E., A.D., AND K.H.**

This Document Relates to:

*A.E. v. Uber Technologies, et al., Inc., et al.;*  
*3:25-cv-07668-CRB; and*

*A.D. v. Uber Technologies, et al., Inc., et al.;*  
*3:25-cv-07091-CRB; and*

*K.H. v. Uber Technologies, et al., Inc., et al.;*  
*3:25-cv-07700-CRB*

I, Dennis R. Reich, declare:

1. I am an attorney with the law firm of Reich & Binstock, LLP (hereinafter “Reich & Binstock” or “Firm”). I am a member of the State Bar of California and am admitted to practice before this Court. I make this declaration based upon my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein.

2. My office met and conferred with opposing counsel on October 10, 2025, prior to Defendants filing their third show cause motion [ECF 4137]. During the meet and confer, the alleged “non-bona fide receipts” that the above-referenced Plaintiffs previously provided during their case intake process were reviewed. My office advised opposing counsel that if the above-

1 referenced Plaintiffs failed to provide additional ride receipts, our office would be seeking to  
2 withdraw as counsel for Plaintiffs.

3 3. The Firm attempted contact with the above referenced Plaintiffs on October 10,  
4 2025, via phone call and email, raising the allegations of Uber and requesting additional proof of  
5 the rides at issue.

6 4. Over the next two weeks, my Firm continued to follow up through email, phone  
7 call, and certified letter advising the above-referenced Plaintiffs that their respective cases would  
8 be dismissed and/or the Firm would be withdrawing as their attorneys without further proof of  
9 the rides at issue.

10 5. At the time of this Declaration, the above-referenced Plaintiffs have not responded  
11 to the Firm's attempts to contact them, nor have they provided any further proof of their rides at  
12 issue. No substitute counsel has been identified.

13 6. My Firm has taken reasonable steps to protect the interests and avoid any prejudice  
14 to the above-referenced Plaintiffs by informing them of their options and consequences of failing  
15 to respond or provide additional proof of their respective Uber rides at issue. It is not anticipated  
16 that Reich & Binstock, LLP's withdrawal as counsel for these respective Plaintiffs will impact  
17 the timing or schedule of this litigation.

18 7. As required by Local Rule 11-5(a), Counsel has provided written notice of  
19 Counsel's intent to withdraw, reasonably in advance, to the above-referenced Plaintiffs as well as  
20 notice to opposing parties.

21 8. I understand that pursuant to Local Rule 11-5(b) that leave to withdraw may be  
22 conditioned on my Firm continuing to accept papers to forward to Plaintiffs and accept this role  
23 should the Court require.

24 I declare under penalty of perjury that the foregoing is true and correct, and that this  
25 declaration was executed on October 27, 2025 in Houston, Texas.

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By: /s/ Dennis C. Reich  
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